

1 Volume I
2 Pages 1 to 110
3 Exhibits (None)

4 UNITED STATES DISTRICT COURT

5 DISTRICT OF MASSACHUSETTS

6 CIRIACO PUCILLO, -----
7 Plaintiff(s),

8 v. Civil Action
9 METSO PAPER INC. AND No. 03-CV-12359 MLW
VALMET CONVERTING, INC.,
Defendant(s).

10 -----
11
12 DEPOSITION OF HAROLD ISHERWOOD, a witness called
13 by counsel for the Plaintiff, taken pursuant to the
14 applicable rules, before Diane L. McElwee, Registered
15 Merit Reporter and Notary Public in and for the
16 Commonwealth of Massachusetts, at the Offices of
17 Proma Technologies, 24 Forge Park, Franklin,
18 Massachusetts, on Friday, February 4, 2005,
19 commencing at 10:05 AM.

20
21
22
23 JAMES GIBBONS & ASSOCIATES
617-428-0402
24

1 A Correct.

2 Q Do you know whether anyone from Atlas or
3 Valmet trained anyone at the Proma facility or
4 Van Leer with respect to the switches on the daughter
5 card?

6 A To the best of my knowledge, no.

7 Q Was it your understanding that the boards as
8 delivered to Proma or Van Leer were ready for
9 installation?

10 A Correct. Absolutely.

11 Q Does Proma or Van Leer buy more than one
12 type of board from Atlas or Valmet?

13 A I am sure we do. To answer your question, I
14 don't know.

15 Q You therefore wouldn't know the model
16 numbers of those boards, correct?

17 A No.

18 Q In 2002 who was responsible for the
19 maintenance of that machine?

20 A Our maintenance department.

21 Q For how long had Proma been responsible and
22 prior to that Van Leer been responsible for the
23 maintenance?

24 A Can you back up?